

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC

Plaintiff,

v.

SAMSUNG ELECTRONIC CO., LTD and
SAMSUNG ELECTRONICS AMERICA, INC.,

Defendants.

Case No. 2:22-CV-00422-JRG-RSP

**DECLARATION OF JARED HARTZMAN IN SUPPORT OF
SAMSUNG'S REPLY IN SUPPORT OF ITS MOTION TO STAY
PENDING *INTER PARTES* REVIEW**

I, Jared Hartzman, hereby declare:

1. I am a principal with the law firm Fish & Richardson P.C., and counsel for Defendants Samsung Electronics Co., Ltd., and Samsung Electronics America, Inc. I have personal knowledge of the facts contained in the declaration and, if called upon to do so, I could and would testify competently to the matters herein.
2. Attached hereto as Exhibit A is a true and correct copy of a redacted series of emails between Headwater counsel and Samsung counsel regarding Headwater's discovery responses.
3. Attached hereto as Exhibit B is a true and correct copy of a series of emails between Headwater counsel and Samsung counsel regarding Samsung's subpoena of ItsOn, Inc.
4. Attached hereto as Exhibit C is a true and correct copy of a letter from Samsung counsel to Headwater counsel regarding Headwater's refusal to timely communicate with Samsung during the litigation.

5. Attached hereto as Exhibit D is a true and correct copy of a series of emails between Headwater counsel and Samsung counsel regarding Samsung's subpoena of Greg Raleigh.

6. Attached hereto as Exhibit E is a true and correct copy of a series of emails between Headwater counsel and Samsung counsel regarding the parties' agreement as to their respective intentions to seek leave to amend/supplement certain contentions.

7. Attached hereto as Exhibit F is a true and correct copy of Headwater's P.R. 4-1 statement.

8. Attached hereto as Exhibit G is a true and correct copy of Samsung's P.R. 4-1 statement.

9. Attached hereto as Exhibit H is an exhibit created for purposes of this motion showing the various dates associated with the ten IPRs Samsung has filed as to the nine asserted patents.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 31st day of October, 2023, in Washington, DC.

/s/ Jared Hartzman
Jared Hartzman